

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

AH, MINOR, BY HER NEXT FRIEND AND MOTHER, : DOCKET NO. 3:17-cv-00391-KM

: :

Plaintiff : CIVIL ACTION

: :

v. : JURY TRIAL DEMANDED

: :

MINERSVILLE SCHOOL DISTRICT, : Defendant :

JOINT MOTION TO STAY ALL PROCEEDINGS

The Parties respectfully request that this Honorable Court Stay All Proceedings in this matter pending consummation of the Settlement in this matter, and in support thereof, allege the following:

1. On November 19, 2019, the Court held a Settlement Conference in this matter, during which the overall terms of settlement were agreed between the parties.
2. On December 10, 2019 the parties have reached agreement on the content and form of a Settlement Agreement and a Consent Decree, and Plaintiff has executed the Agreement.
3. Consummation of the Settlement requires the following remaining actions:
 - a. Consideration and Approval of the Settlement Agreement and Consent Decree by Defendant's Board of Education, scheduled for January 22, 2019.
 - b. Plaintiff filing, and the Court issuing an Order approving Settlement in a Minor's Action, and execution of the Consent Decree.

WHEREFORE, the parties jointly request that the Court vacate the Trial Scheduling Order dated October 16, 2019, and issue an Order Staying All Proceedings

pending the filing of a Motion to Approve Settlement or certification the Settlement has not been approved by the Defendant's Board of Education.

Respectfully submitted,

HAHALIS & KOUNOUPIS, P.C.

BY:/s/ David L. Deratzian
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Date: December 16, 2019

CERTIFICATE OF SERVICE

I, David L. Deratzian, Esquire, hereby certify that on December 16, 2019 a copy of the Joint Motion to Modify the Scheduling Order upon the person(s) and in the manner indicated below:

ECF Filing: Christopher J. Conrad, Esquire
Attorney for Defendants

BY:/s/ David L. Deratzian

Date: December 16, 2019